

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

April 2, 2018

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees, on behalf of all plaintiffs, write to request a brief extension of the deadline to submit plaintiffs' reply brief in further support of their Motion to Compel as to defendants World Assembly of Muslim Youth-Saudi Arabia and World Assembly of Muslim Youth-International at ECF No. 3911.

On Friday, March 30, 2018, WAMY filed its opposition to plaintiffs' Motion to Compel, including thirty-three supporting exhibits at ECF No. 3949. After reviewing WAMY's submission, plaintiffs believe they will need additional time to confer with their subject matter experts and linguists concerning the issues raised in WAMY's brief. Unfortunately, several of those experts are unavailable this week due to the Passover holiday. Plaintiffs will also need time to obtain certified translations of a number of Arabic documents produced by WAMY, which we intend to file with our reply brief.¹ Plaintiffs therefore respectfully request that the deadline to file their reply brief be extended one week from April 6, 2018 to April 13, 2018. Plaintiffs have conferred with counsel for WAMY and they consent to the proposed extension.

Plaintiffs thank Your Honor in advance for the Court's attention to this matter.

¹ Plaintiffs are in possession of privileged analyses and non-certified translations of WAMY's documents, but need to obtain final, certified translations for those documents we anticipate submitting to the Court.

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Respectfully submitted,

COZEN O'CONNOR



By: J. Scott Tarbutton, on behalf of the PECs

cc: All MDL Counsel of Record (via ECF)

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